

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR
9004-1(b)**

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Counsel to Defendants Javier Torres, Media
Effective, LLC, Dora Dillman, Javier Torres,
Jr., Natalia Torres, Paulina Torres.

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*,¹

Debtors.

AIRN LIQUIDATION TRUST CO., LLC, in
its capacity as Liquidation Trustee of the
AIRN LIQUIDATION TRUST,

Plaintiff,

v.

MEDIA EFFECTIVE LLC, *et al.*,

Defendants.

Chapter 11

Case No: 22-14539-JKS

(Jointly Administered)

Adv. Pro. No. 23-1335-JKS

APPLICATION FOR ORDER SHORTENING TIME

The applicants Javier Torres (“Javier”), Media Effective, LLC (“Media”), Dora Dillman, Javier Torres, Jr., Natalia Torres, Paulina Torres (the “Torres Family,” and collectively with Javier and Media, the “Defendants”), request that the time period for a hearing on the Motion to Strike

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/NRIA>.

the April 4, 2024, Declarations of Angela Solk and Patryk Golaszewski (the “Motion”) be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because:

The Defendants require consideration of the Motion on an emergent basis, in order to prevent the Trustee from using the Declarations of Angela Solk (“Solk”) and Patryk Golaszewski (“Golaszewski”) (the “Declarations”) from being used at the hearing on April 10, 2024, and the injustice on Defendants and denial of due process of law that would result from the Trustee being allowed to use the Declarations as evidence or testimony.

2. State the hearing dates requested:

As soon as the Court’s calendar permits, preferably on or before April 10, 2024.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicants request entry of the proposed order shortening time.

Respectfully submitted,

Dated: April 8, 2024

/s/ Edmond M. George

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